

1 William A. Isaacson (admitted *pro hac vice*)
2 Melissa Felder (admitted *pro hac vice*)
3 BOIES, SCHILLER & FLEXNER LLP
4 5301 Wisconsin Ave. NW, Suite 800
5 Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsfllp.com
mfelder@bsfllp.com

6 Philip J. Iovieno (admitted *pro hac vice*)
7 Anne M. Nardacci (admitted *pro hac vice*)
Christopher Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
anardacci@bsfllp.com
cfenlon@bsfllp.com

12 [Additional counsel listed in signature page]

13 Counsel for Plaintiffs MetroPCS Wireless, Inc.; Office Depot, Inc.; Interbond Corporation of
14 America, Inc.; Schultze Agency Services, LLC; P.C. Richard & Son Long Island Corporation;
MARTA Cooperative of America, Inc.; ABC Appliance, Inc.; Tech Data Corporation and Tech
15 Data Product Management, Inc.; The AASI Creditor Liquidating Trust; CompuCom Systems,
Inc.; and NECO Alliance LLC

16 UNITED STATES DISTRICT COURT
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 IN RE: TFT-LCD (FLAT PANEL)
19 ANTITRUST LITIGATION

CASE NO. M:07-md-01827-SI

MDL No. 1827

20 This Document Relates to:

CASE NOS. 3:10-cv-05458-SI;
3:11-cv-0829-SI; 3:11-cv-02225-SI;
3:11-cv-02495-SI; 3:11-cv-03763-SI;
3:11-cv-03856-SI; 3:11-cv-04119-SI;
3:11-cv-05765-SI; 3:11-cv-05781-SI;
3:11-cv-06241-SI; 3:12-cv-00335-SI;
3:12-cv-01426-SI; 3:12-cv-02495-SI; and
3:10-cv-05625-SI

21 *SB Liquidation Trust v. AU Optronics Corp., et al.*, 3:10-cv-05458-SI

22 *MetroPCS Wireless, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-00829-SI

23 *Office Depot, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-02225-SI

24 *Jaco Electronics, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-02495-SI

**STIPULATION AND [PROPOSED]
ORDER REGARDING CERTAIN
EXPERT DEPOSITIONS IN TRACK 2**

1	<i>Interbond Corp. of America v. AU Optronics Corp., et al.</i> , 3:11-cv-03763-SI
2	<i>Schultze Agency Services, LLC, on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC, v. AU Optronics Corp., et al.</i> , 3:11-cv-03856-SI
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5	<i>P.C. Richard & Son Long Island Corp., et al. v. AU Optronics Corp., et al.</i> , 3:11-cv-04119-SI
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7	<i>Tech Data Corp., et al. v. AU Optronics Corp., et al.</i> , 3:11-cv-05765-SI
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9	<i>The AASI Creditor Liquidating Trust, by and through Kenneth A. Welt, Liquidating Trustee v. AU Optronics Corp., et al.</i> , 3:11-cv-05781-SI
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11	<i>CompuCom Systems, Inc. v. AU Optronics Corp., et al.</i> , 3:11-cv-06241-SI
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13	<i>NECO Alliance LLC v. AU Optronics Corp., et al.</i> , 3:12-cv-01426-SI
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15	<i>Rockwell Automation, Inc. v. AU Optronics Corp., et al.</i> , 3:12-cv-02495-SI
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17	<i>Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust v. AU Optronics Corp., et al.</i> , 3:10-cv-05625-SI
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Plaintiffs in the above-captioned cases (collectively, “Track 2 Cases”) and Defendants in the Track 2 Cases (respectively, “Plaintiffs” and “Defendants,” collectively, “Parties”) hereby stipulate as follows:

WHEREAS, on June 13, 2013, Plaintiffs have submitted reports from B. Douglas Bernheim, Adam Fontecchio, David Stowell, and Leslie Marx (as to certain Plaintiffs only) (collectively, “Plaintiffs’ Track 1 Experts”), among others, in the Track 2 Cases (including any erratas, supplements, and amendments thereto, “June 2013 Reports”);

WHEREAS, Plaintiffs’ Track 1 Experts also appeared on behalf of plaintiffs in one or more of the following cases in this Multidistrict Litigation: *AT&T Mobility LLC, et al. v. AU Optronics Corp., et al.*, Case No. 09-CV-4997-SI; *ATS Claim, LLC v. Epson Electronics America, Inc., et al.*, Case No. 3:09-CV-01115-SI; *Nokia Corp. and Nokia Inc. v. AU Optronics Corp., et al.*, Case No. 3:09-CV-05609; *Costco Wholesale Corp. v. AU Optronics Corp., et al.*,

1 Case No. 11-CV-00058-SI; *Best Buy v. AU Optronics Corp., et al.*, Case No. 10-CV-04972-SI;
2 *Electrograph Systems, Inc. v. Epson Imaging Devices Corp., et al.*, Case No. 10-CV-00017-SI;
3 *Motorola Mobility Inc. v. AU Optronics Corp., et al.*, Case No. 09-CV-05840-SI, and *Target*
4 *Corp., et al. v. AU Optronics Corp., et al.*, Case No. 10-CV-04945-SI (collectively, “Track 1
5 Cases”);

6 WHEREAS, Plaintiffs’ Track 1 Experts sat for depositions in the Track 1 Cases;

7 WHEREAS the Parties want to avoid duplicative and repetitive questioning of Plaintiffs’
8 Track 1 Experts in depositions in the Track 2 Cases in light of their previous depositions and the
9 similarity between Plaintiffs’ Track 1 Experts’ reports in the Track 1 Cases and Plaintiffs’ Track
10 1 Experts’ reports in the Track 2 Cases, and to create efficiency in and limit the time of those
11 depositions; and

12 WHEREAS the Parties do not want to get bogged down in disputes over whether a
13 particular question is duplicative of a question asked of a Plaintiffs’ Track 1 Expert during the
14 Track 1 Cases;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
16 Parties through their undersigned counsel as follows:

- 17 1. Any testimony made at deposition by a Plaintiffs’ Track 1 Expert in a Track 1 Case
18 will have same legal and evidentiary effect as if noticed and taken in the Track 2 cases
19 concerning the June 2013 Reports and the Track 2 Plaintiffs.
- 20 2. Any deposition that Defendants take of a Plaintiffs’ Track 1 Expert in the Track 2
21 Cases regarding the June 2013 Reports will be limited to a seven hour period. This is
22 not a limitation on the deposition regarding any Plaintiffs’ Track 1 Expert’s reply
23 reports (which may not be duplicative of Plaintiffs’ Track 1 Experts’ reports in the
24 Track 1 Cases), or of any expert’s deposition other than Plaintiffs’ Track 1 Experts.
- 25 3. This stipulation does not give rise to an objection to questions as being duplicative of
26 questions asked during the Track 1 Cases.

1 Dated: August 23, 2013

2 Respectfully submitted,

3 By: /s/ Philip J. Iovieno
4 William Isaacson (admitted *pro hac vice*)
5 Melissa Felder (admitted *pro hac vice*)
6 BOIES, SCHILLER & FLEXNER LLP
7 5301 Wisconsin Avenue NW, Suite 800
8 Washington, DC 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com
mfelder@bsflp.com

9 Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Christopher Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsflp.com
anardacci@bsflp.com
cfenlon@basflp.com

11 Stuart H. Singer (admitted *pro hac vice*)
Meredith Schultz (admitted *pro hac vice*)
BOIES, SCHILLER, & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
Email: ssinger@bsflp.com
mschultz@bsflp.com

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28
Attorneys for Plaintiffs MetroPCS Wireless, Inc.;
Office Depot, Inc.; Interbond Corp. of America;
Schultze Agency Services, LLC; P.C. Richard & Son
Long Island Corporation; MARTA Cooperative of
America, Inc.; ABC Appliance Inc.; Tech Data Corp.
and Tech Data Product Management, Inc.; The AASI
Creditor Liquidating Trust; CompuCom Systems, Inc.;
and NECO Alliance LLC

1 By: /s/ Robert W. Turken
2 Robert W. Turken
3 Mitchell E. Widon
4 Scott N. Wagner
5 BILZIN SUMBERG BAENA PRICE & AXELROD
6 LLP
7 1450 Rickell Avenue, Suite 2300
8 Miami, FL 33131-3456
9 Telephone: (305) 374-7580
Facsimile: (305) 374-7593
Email: rturken@bilzin.com
mwidom@bilzin.com
swagner@bilzin.com

10
11
12
13
14
15
16
17
18
19
20
21
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23
24
25
26
27
28

Attorneys for Plaintiffs Tech Data Corp. and Tech
Data Product Management, Inc. and The AASI
Creditor Liquidating Trust

By: /s/ H. Lee Godfrey
H. Lee Godfrey
Kenneth S. Marks
Jonathan J. Ross
Johnny W. Carter
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
Email: lgodfrey@susmangodfrey.com
kmarks@susmangodfrey.com
jross@susmangodfrey.com
jcarter@susmangodfrey.com

Parker C. Folse III
Rachel S. Black
Jordan Connors
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
Email: pfolse@susmangodfrey.com
rblack@susmangodfrey.com
jconnors@susmangodfrey.com

Attorneys for Plaintiff Alfred H. Siegel, as Trustee of
the Circuit City Stores, Inc. Liquidating Trust

1 By: /s/ Marc M. Seltzer
2 Marc M. Seltzer (54534)
3 Steven G. Sklaver (237612)
4 SUSMAN GODFREY LLP
5 1901 Avenue of the Stars, Suite 950
6 Los Angeles, CA 90067-6029
7 Telephone: (310) 789-3100
8 Facsimile: (310) 789-3150
9 Email: mseltzer@susmangodfrey.com
ssklaver@susmangodfrey.com

10 Erica W. Harris
11 SUSMAN GODFREY LLP
12 1000 Louisiana, Suite 5100
13 Houston, TX 77002-5096
14 Telephone: (713) 651-9366
15 Facsimile: (713) 654-6666
16 Email: eharris@susmangodfrey.com

17 *Attorneys for SB Liquidation Trust*

18
19
20
21
22
23
24
25
26
27
28

1 By: /s/ Jerome A. Murphy

2 Jeffrey H. Howard (*pro hac vice*)
3 Jerome A. Murphy (*pro hac vice*)
4 CROWELL & MORING LLP
5 1001 Pennsylvania Avenue, N.W.
6 Washington, DC 20004
7 Telephone: (202) 624-2500
8 Facsimile: (202) 628-5116
9 Email: jhoward@crowell.com
jmurphy@crowell.com

10 Jason C. Murray (CA Bar No. 169806)
11 Janet I. Levine (CA Bar No. 94255)
12 Joshua C. Stokes (CA Bar No. 220214)
13 CROWELL & MORING LLP
14 515 South Flower Street, 40th Floor
15 Los Angeles, CA 90071
16 Telephone: (213) 622-4750
17 Facsimile: (213) 622-2690
18 Email: jmurray@crowell.com
jlevine@crowell.com
jstokes@crowell.com

19 Kenneth L. Adams (*pro hac vice*)
20 R. Bruce Holcomb (*pro hac vice*)
21 Christopher T. Leonardo (*pro hac vice*)
22 ADAMS HOLCOMB LLP
23 1875 Eye Street NW
24 Washington, DC 20006
25 Telephone: (202) 580-8822
26 Facsimile: (202) 580-8821
27 Email: adams@adamsholcomb.com
holcomb@adamsholcomb.com
leonardo@adamsholcomb.com

28 *Liaison Counsel for Plaintiffs and Attorneys for
Plaintiffs Jaco Electronics, Inc. and Rockwell
Automation, Inc.*

1 *By: /s/ Lee F. Berger

2 Holly A. House (State Bar No. 136045)
3 Kevin C. McCann (State Bar No. 120874)
4 Lee F. Berger (State Bar No. 222756)
5 Sean Unger (State Bar No. 231694)
6 PAUL HASTINGS LLP
7 55 Second Street
8 Twenty-Fourth Floor
9 San Francisco, CA 94105
10 Telephone: (415) 856-7000
11 Facsimile: (415) 856-7100
12 Email: kevinmccann@paulhastings.com
13 hollyhouse@paulhastings.com
14 leeberger@paulhastings.com
15 seanunger@paulhastings.com

16 Brad D. Brian (State Bar No. 079001)
17 Jerome C. Roth (State Bar No. 159483)
18 MUNGER, TOLLES & OLSON LLP
19 355 South Grand Avenue
20 Los Angeles, CA 90071-1560
21 Telephone: (213) 683-9100
22 Facsimile: (213) 687-3702
23 Email: Brad.Brian@mto.com

24 *Attorneys for Defendants LG Display Co., Ltd. and LG
25 Display America, Inc.*

26 By: /s/ Stephen P. Freccero

27 Melvin R. Goldman (SBN 34097)
28 Stephen P. Freccero (SBN 131093)
Derek F. Foran (SBN 224569)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522
Email: mgoldman@mofo.com
sfreccero@mofo.com
dforan@mofo.com

29 *Attorneys for Defendants Epson Imaging Devices
30 Corporation and Epson Electronics America, Inc.*

1 By: /s/ Carl L. Blumenstein
2 Christopher A. Nedeau (State Bar No. 81297)
3 Carl L. Blumenstein (State Bar No. 124158)
4 Farschad Farzan (State Bar No. 215194)
5 NOSSAMAN LLP
6 50 California Street, 34th Floor
7 San Francisco, CA 94111
8 Telephone: (415) 398-3600
9 Facsimile: (415) 398-2438
10 Email: cnedea@nossaman.com
11 cblumenstein@nossaman.com
12 ffarzan@nossaman.com

13 *Attorneys for Defendants AU Optronics Corporation
14 and AU Optronics Corporation America*

15 By: /s/ Christopher M. Curran
16 Christopher M. Curran (*pro hac vice*)
17 Martin M. Toto (*pro hac vice*)
18 John H. Chung (*pro hac vice*)
19 WHITE & CASE LLP
20 1155 Avenue of the Americas
21 New York, NY 10036
22 Telephone: (212) 819-8200
23 Facsimile: (212) 354-8113
24 Email: ccurran@whitecase.com
25 mtoto@whitecase.com
26 jchung@whitecase.com

27 *Attorneys for Toshiba Corporation, Toshiba Mobile
28 Display Co., Ltd., Toshiba America Electronic
Components, Inc. and Toshiba America Information
Systems, Inc.*

1 By: /s/ Neal A. Potischman

2 Neal A. Potischman (SBN 254862)
3 neal.potischman@davispolk.com
4 DAVIS POLK & WARDWELL LLP
5 1600 El Camino Real
Menlo Park, California 94025
Telephone: (650) 752-2000
Facsimile: (650) 752-2111

6 *Counsel for Chi Mei Optoelectronics Corporation*
(n/k/a Innolux Corporation), CMO Japan Co., Ltd.,
and Chi Mei Optoelectronics USA, Inc. for the Office
Depot, Inc., Interbond Corp. of America, Schultze
Agency Services, LLC, P.C. Richard & Son Long
Island Corp., et al., Tech Data Corp., et al., The AASI
Creditor Liquidating Trust, CompuCom Systems, Inc.,
and NECO Alliance LLC Actions Only

10 /s/ Michael R. Scott

11 Michael R. Scott (pro hac vice)
mrs@hcmp.com
12 Michael J. Ewart (pro hac vice)
mje@hcmp.com
13 HILLIS CLARK MARTIN & PETERSON P.S.
1221 Second Avenue, Suite 500
14 Seattle, WA 98101-2925
Telephone: (206) 623-1745
15 Facsimile: (206) 623-7789

16 *Counsel for Chi Mei Optoelectronics Corporation*
(n/k/a Innolux Corporation), CMO Japan Co., Ltd.,
and Chi Mei Optoelectronics USA, Inc. for the
MetroPCS Wireless, Inc. Action Only

19 By: /s/ William S. Farmer

20 William S. Farmer (SBN 46694)
David C. Brownstein (SBN 141929)
Jacob P. Alpren (SBN 235713)
Farmer Brownstein Jaeger LLP
235 Pine Street, Suite 1300
22 San Francisco, CA 94104
Telephone: (415) 795-2050
Email: wfarmert@fbj-law.com
dbrownstein@fbj-law.com
jalpren@fbj-law.com

25 *Counsel for Chunghwa Picture Tubes, Ltd. in the*
MetroPCS Wireless Actions Only

1 By: /s/ Rachel S. Brass

2 Rachel S. Brass (SBN 219301)
3 Joel S. Sanders (SBN 107234)
4 Austin V. Schwing (SBN 211696)
5 GIBSON, DUNN & CRUTCHER LLP
6 555 Mission Street, Suite 3000
7 San Francisco, California 94105
8 (415) 393-8200 / (415) 393-8306
9 *jsanders@gibsondunn.com*
rbrass@gibsondunn.com

10 *Attorneys for Defendants Chunghwa Picture Tubes,*
11 *Ltd. in the SB Trust, Office Depot, Jaco Electronics,*
12 *Interbond, Schultze Agency Services, PC Richard,*
13 *Tech Data, AASI Creditor Liquidating Trust,*
14 *CompuCom, Viewsonic, and NECO Alliance Actions*
15 *Only*

16 By: /s/ Robert E. Freitas

17 Robert E. Freitas (SBN 80948)
18 Jason S. Angell (SBN 221607)
19 Jerry Chen (SBN 229318)
20 FREITAS TSENG & KAUFMAN LLP
21 100 Marine Parkway, Suite 200
22 Redwood Shores, CA 94065
23 Telephone: (650) 593-6300
24 Facsimile: (650) 593-6301
25 Email: *r.freitas@ftklaw.com*
j.angell@ftklaw.com
j.chen@ftklaw.com

26 *Attorneys for Defendant HannStar Display*
27 *Corporation*

28 By: /s/ Jacob R. Sorensen

19 Jacob R. Sorensen (SBN 209134)
20 John M. Grenfell (SBN 88500)
21 Fusae Nara (*pro hac vice*)
22 Andrew D. Lanphere (SBN 191479)
23 PILLSBURY WINTHROP SHAW PITTMAN LLP
24 Four Embarcadero Center, 22nd Floor
25 San Francisco, CA 94111
Telephone: (415) 983-1000
Facsimile: (415) 983-1200
Email: *john.grenfell@pillsburylaw.com*
jake.sorensen@pillsburylaw.com
fusae.nara@pillsburylaw.com
andrew.lanphere@pillsburylaw.com

26 *Attorneys for Defendants Sharp Corporation and*
27 *Sharp Electronics Corporation*

1 By: /s/ Michael W. Scarborough
2 Michael W. Scarborough (SBN 203524)
3 SHEPPARD MULLIN RICHTER & HAMPTON
4 Four Embarcadero Center, 17th Floor
5 San Francisco, CA 94111
6 Telephone: (415) 434-9100
7 Facsimile: (415) 434-3947
8 Email: mscarborough@sheppardmullin.com

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Defendants *Samsung SDI America, Inc.*
and Samsung SDI Co., Ltd.

By: /s/ Kent M. Roger
Kent M. Roger (Bar No. 95987)
MORGAN LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1126
Telephone: (415) 442-1000
Facsimile: (415) 442-1001
Email: kroger@morganlewis.com

Attorneys for Defendants *Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.) and Hitachi Electronic Devices (USA), Inc.*

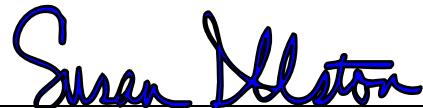
By: /s/ Stephen Holbrook Sutro
George Dominic Niespolo
Stephen Holbrook Sutro
DUANE MORRIS LLP
One Market , Spear Tower, Suite 2200
San Francisco, CA 94105
Telephone: (415) 957-3010
Facsimile: (415) 957-3001
Email: gdniespolo@duanemorris.com
shsutro@duanemorris.com

Attorneys for *NEC Corporation, NEC LCD Technologies, Ltd., and Renesas Electronics America, Inc.*

1 *Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this
2 document has been obtained from each of the above signatories.
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5 **IT IS SO ORDERED.**

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7 Dated: 8/30/13



Hon. Susan Illston
United States District Judge